

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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IN RE: NATIONAL FOOTBALL LEAGUE : No. 2:12-md-02323 -AB  
PLAYERS' CONCUSSION :  
INJURY LITIGATION : MDL No. 2323

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THIS DOCUMENT RELATES TO: :  
TONY BERTI, PLAINTIFF : Hon. Anita B. Brody

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**NOTICE OF ATTORNEY'S LIEN**

Pursuant to U.C.C. § 9-303, and *Stephens v. Wetzel*, Sb.2d 293 (Miss. 2000), the Petitioners, John D. Giddens for John D. Giddens, P.A. and Philip Thomas for Philip W. Thomas, P.A., attorneys for the Plaintiff in the above-entitled action, hereby notify this Court and all parties that they have a lien in this case for reasonable attorney's fees.

On or about June 11, 2012, the Plaintiff entered into an employment agreement with John D. Giddens, PA and Philip W. Thomas, PA. On or about December 27, 2016, Plaintiff entered into a consent to associate agreement bringing on the law firms of Stern Law Group, and Mokaram & Associates, P.C. It was agreed between parties that 33 1/3% of any fee received would be paid to Philip W. Thomas, P.A. and John D. Giddens, P.A. to be split equally amongst such firms and the remaining 66 2/3% of the fees would be split equally amongst Mokaram & Associates, P.C. and Stern Law Group.

As of today's date, it is the undersigned's belief that this matter has not been settled.

Dated: April 11, 2023

Respectfully Submitted By:

s/John D. Giddens  
John D. Giddens

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**CERTIFICATE OF SERVICE**

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I certify that I electronically filed the foregoing document with the Clerk of the Court using the ECF system which sent notification of such filing to all counsel of record.

This the 11th day of April, 2023.

s/John D. Giddens  
John D. Giddens